

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THE FORM.)

## I. (a) PLAINTIFFS

OLIVIA ROJAS

(b) County of Residence of First Listed Plaintiff Philadelphia County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Russell P. Lieberman, Esquire  
Allison M. Goldberg, Esquire  
White and Williams LLP  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103  
215-864-6285 / 215-864-6399

## DEFENDANTS

APPOLLO IMPORTS INC. and  
APPOLLO SCOOTERSCounty of Residence of First Listed Defendant New Castle County  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1. U.S. Government Plaintiff ☐ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant ☒ 4. Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input checked="" type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input checked="" type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Production Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdiction statutes unless diversity):

28 U.S.C. Section 1332

Brief description of cause:

Personal injury, products liability

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ in excess of \$150,000

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

January 10, 2024

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44****Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DESIGNATION FORM**

*(to be used by counsel to indicate the category of the case for the purpose of assignment to the appropriate calendar)*

Address of Plaintiff: 1221 S. Broad Street, Philadelphia, Pennsylvania 19147

Address of Defendant: 2915 Ogletown Road, #3696, Newark, Delaware 19713 / 642 Rue de Courcelle, 404, Montreal, Quebec H4C 3C7, CA

Place of Accident, Incident or Transaction: Philadelphia, Pennsylvania (Broad Street near its cross-section with Carpenter Street)

**RELATED CASE IF ANY:**

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated \_\_\_\_\_

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit Pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier Numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se case filed by the same individual?   | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any now pending or within one year previously terminated action in this court except as note above.

DATE: January 10, 2024



Attorney-at-Law *(Must sign above)*

309695

Attorney I.D. # (if applicable)

**Civil (Place a ✓ in one category only)**

**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☐ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. All Other Federal Question Cases. *(Please specify):* \_\_\_\_\_

**B. Diversity Jurisdiction Cases:**

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☒ 6. Other Personal Injury *(Please specify):* \_\_\_\_\_
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: *(Please specify)* \_\_\_\_\_

**ARBITRATION CERTIFICATION**

*(The effect of this certification is to remove the case from eligibility for arbitration)*

I, Russell P. Lieberman, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2 § 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: January 10, 2024



Attorney-at-Law *(Sign here if applicable)*

309695

Attorney ID # (if applicable)

NOTE: A trial de novo will be a jury only if there has been compliance with F.R.C.P. 38.

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

OLIVIA ROJAS  
1221 S. Broad Street  
Philadelphia, PA 19147

Plaintiff

v.

APOLLO IMPORTS INC.  
2915 Ogletown Road  
#3696  
Newark, Delaware, 19713

And

APOLLO SCOOTERS  
642 Rue de Courcelle  
404  
Montreal, Quebec H4C 3C7, CA

Defendants.

**CIVIL ACTION**

**No.**

**JURY TRIAL DEMANDED**

**CIVIL ACTION COMPLAINT**

Plaintiff, Olivia Rojas, alleges as follows:

**THE PARTIES**

1. Plaintiff, Olivia Rojas, is an adult individual who resides at 1221 S. Broad Street, Philadelphia, PA 19147. Plaintiff is a citizen of the Commonwealth of Pennsylvania.
2. Defendant, Apollo Imports, Inc., is a Delaware Domestic Corporation with its principal place of business located at 2915 Ogletown Rd, #3696, Newark, DE 19713.
3. Defendant, Apollo Scooters, is a corporation headquartered in Montreal Quebec with its principal place of business located at 642 Rue de Courcelle, 404, Montreal Quebec H4C 3C7, CA.

4. At all times material hereto, Defendants acted through their authorized employees, servants, agents, and/or apparent agents.

### **NATURE OF THE CASE**

5. This is a personal injury case arising out of an incident which occurred on or about May 10, 2023 on Broad Street near its cross-section with Carpenter Street in Philadelphia, Pennsylvania.

6. On or about May 10, 2023, Plaintiff suffered serious bodily injuries while riding the Apollo City electric scooter due to the unsafe, dangerous, defective design and/or manufacture of the scooter, which was designed, manufactured, and/or placed into the stream of commerce by Defendants Apollo Imports Inc. and Apollo Scooters.

### **JURISDICTION AND VENUE**

7. Jurisdiction is based upon the diversity of citizenship of the parties. Plaintiff is a citizen of the Commonwealth of Pennsylvania. Defendant Apollo Imports Inc. is a citizen of the State of Delaware. Defendant Apollo Scooters is a citizen of Canada.

8. The amount in controversy in this case exceeds the sum of \$75,000 exclusive of interest and costs.

9. Venue lies with this Honorable Court by virtue of the fact that the accident giving rise to this action took place in the Commonwealth of Pennsylvania within the geographic boundaries of the Eastern District.

### **FACTS**

10. On or about October 14, 2021, Plaintiff received an Apollo City electric scooter as a gift from her aunt. The product was delivered to Plaintiff's home in its original packaging.

11. On or about May 10, 2023, Plaintiff was riding the Apollo City electric scooter on Broad Street near its cross-section with Carpenter Street in Philadelphia, Pennsylvania.

12. As she was riding the scooter, the scooter's folding mechanism unexpectedly engaged and the stem collapsed, causing Plaintiff to be thrown from the scooter.

13. As a result of the incident, Plaintiff sustained injuries including but not limited to an ulnar fracture of her right wrist, functional injuries, and cellulitis of her legs.

14. The accident and injuries were caused by the combined liability-producing conduct of Defendants, consisting of designing, manufacturing, producing, selling, and placing into the stream of commerce defective products, and by failing to exercise reasonable care in designing, marketing, selling, and using the products.

15. Plaintiff has been required to undergo medical, rehabilitative, and related care and treatment for her injuries.

16. Plaintiff has been left with severe nerve damage and permanent scarring and disfigurement.

17. As a result of the incident and injuries, Plaintiff has in the past and will in the future suffer severe physical and psychological pain and suffering, a loss of life's pleasures, and embarrassment.

18. As a result of the incident and injuries, Plaintiff has suffered a loss of earnings and/or reduction in her earning capacity.

19. As a result of the accident and injuries, Plaintiff has been required to expend certain sums of money for medical treatment and will be required to incur expenses for medical and related treatment indefinitely into the future.

**COUNT I**  
**PLAINTIFF v. DEFENDANT APOLLO IMPORTS INC.**



20. The Paragraphs above are incorporated by reference as though fully set forth herein.

21. The accident and injuries were caused by the defective nature of the Apollo City electric scooter designed, manufactured, sold, supplied, and/or placed into the stream of commerce by Defendant Apollo Imports, Inc.

22. The scooter was defective in the following particulars:

- a. The product lacked adequate warnings;
- b. The scooter lacked features necessary to make it safe for its intended use;
- c. The scooter contained design features which made it unsafe for its intended purpose;
- d. The scooter was designed in such a way that the scooter's folding mechanism could unexpectedly engage;
- e. The utility of the scooter is greatly outweighed by the risks posed by the scooter to its intended users.

23. The design and/or manufacture of the scooter failed to meet consumer expectations for safety of scooters marketed for use due to their inherent danger created by the scooters folding mechanism unexpectedly engaging.

24. The risk created by the design and/or manufacture of the scooter outweighed any possible benefits of the utility of the scooter.

25. The scooter that caused the Plaintiff's injury may have been manufactured out of conformity with its design that allowed the scooter's folding mechanism to unexpectedly engage and collapse.

26. Defendant Apollo Imports Inc. is strictly liable to Plaintiff by virtue of the fact that it marketed, sold, supplied, and/or placed into the stream of commerce the defective product that caused Plaintiff's injuries as described herein.

WHEREFORE, Plaintiff, Olivia Rojas, demands judgment in her favor and against Defendant Apollo Imports, Inc. individually, jointly, and severally with Co-Defendant, in an amount in excess of \$75,000.00, exclusive of interest and costs.

**COUNT II**  
**PLAINTIFF v. DEFENDANT APOLLO SCOOTERS**

27. The Paragraphs above are incorporated by reference as though fully set forth herein.

28. The design and/or manufacture of the scooter failed to meet consumer expectations for safety of scooters marketed for use due to their inherent danger created by the scooters folding mechanism unexpectedly engaging.

29. The risk created by the design and/or manufacture of the scooter outweighed any possible benefits of the utility of the scooter.

30. The scooter that caused the Plaintiff's injury may have been manufactured out of conformity with its design that allowed the scooter's folding mechanism to unexpectedly engage and collapse.


31. Defendant Apollo Scooters is strictly liable to Plaintiff by virtue of the fact that it marketed, sold, supplied, and/or placed into the stream of commerce the defective product that caused Plaintiff's injuries as described herein.

WHEREFORE, Plaintiff, Olivia Rojas, demands judgment in her favor and against Defendant Apollo Scooters individually, jointly, and severally with Co-Defendant, in an amount in excess of \$75,000.00, exclusive of interest and costs.



Plaintiff Olivia Rojas

By her attorneys,

BY:   
\_\_\_\_\_  
Russell P. Lieberman (309695)  
Allison M. Goldberg (330474)  
1650 Market Street  
One Liberty Place, Suite 1800  
Philadelphia, PA 19103-7395  
Phone: 215-864-6285  
Fax: 215-789-7533  
[liebermanr@whiteandwilliams.com](mailto:liebermanr@whiteandwilliams.com)  
[goldberga@whiteandwilliams.com](mailto:goldberga@whiteandwilliams.com)

Dated: January 10, 2024

**VERIFICATION**

Olivia Rojas says, subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities, that she is the named Plaintiff, that she is authorized to make this Verification on her behalf, and that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information, and belief.



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Olivia Rojas